

1 WAUKEEN Q. McCOY, ESQ. (SBN: 168228)  
LAW OFFICES OF WAUKEEN Q. McCOY  
2 703 Market Street, Suite 1407  
San Francisco, California 94103  
3 Telephone (415) 675-7705  
Facsimile (415) 675-2530  
4

5 SHYAMALA T. RAJENDER, ESQ. (SBN: 69806)  
RAJENDER LAW OFFICES  
6 4115 Blackhawk Plaza Circle  
Suite 100  
7 Danville, CA 94506  
Telephone (925) 648-2028  
8 Facsimile (925) 648-2035

9 Attorneys for Plaintiff  
REBECCA COOPER  
10

11 VILLARREAL HUTNER & TODD PC  
LARA VILLARREAL HUTNER, ESQ., Cal. Bar No. 178639  
12 E-Mail: lhutner@vhtattorneys.com  
JESSICA N. LEAL, ESQ., Cal Bar No. 267232  
13 E-Mail: jleal@vhtattorneys.com  
575 Market Street, Suite 300  
14 San Francisco, California 94105  
Telephone: 415.543.4200  
15 Facsimile: 415.512.7674

16 Attorneys for Defendant  
UNITED PARCEL SERVICE, INC.,  
17 an Ohio Corporation  
(erroneously named as "UNITED PARCEL  
18 SERVICE OF AMERICA, INC.")

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION  
21

22 REBECCA COOPER, an individual,

23 Plaintiff,

24 v.

25 UNITED PARCEL SERVICE OF AMERICA,  
INC., and DOES 1-50,

26 Defendants.  
27  
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Case No. CV 10-04764 CRB

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO RESCHEDULE  
CASE MANAGEMENT CONFERENCE**

Date: December 2, 2011

Time: 8:30 a.m.

Judge: Hon. Charles R. Breyer

1 Plaintiff Rebecca Cooper (hereinafter "Plaintiff"), through her counsel Law Offices of  
2 Waukeen Q. McCoy and Rajender Law Offices, and Defendant United Parcel Service, Inc.  
3 (erroneously named as United Parcel Service of America, Inc., hereinafter "UPS"), through its  
4 counsel Villarreal Hutner & Todd PC, (collectively "the Parties") do hereby agree and stipulate to  
5 reschedule the December 2, 2011 case management conference for good cause for the reasons set  
6 forth below, and as supported by the Declarations of Waukeen Q. McCoy and Lara Villarreal  
7 Hutner.

8 1. On August 26, 2011, Plaintiff's counsel, Waukeen Q. McCoy, noticed the  
9 deposition of Plaintiff's former manager Victor Neals for November 2, 2011. This date was  
10 selected based on the Parties' availability in advance of the settlement conference initially  
11 scheduled with Magistrate Judge Maria Elena James for November 15, 2011.

12 2. On October 31, 2011, Mr. McCoy notified UPS that he had to cancel Mr. Neals's  
13 November 2nd deposition due to a conflict.

14 3. As the Parties were unavailable to reschedule Mr. Neals's deposition prior to the  
15 November 15th settlement conference with Magistrate Judge James, the Parties stipulated to  
16 reschedule the settlement conference. Counsel for the Parties each believed that a settlement  
17 conference would be most meaningful after the completion of Mr. Neals's deposition.

18 4. Given the holiday period from Thanksgiving to New Years is UPS's busiest season,  
19 the Parties have agreed to reschedule Mr. Neals's deposition to January 10, 2012, which is a time  
20 less disruptive to the company's peak season and when all parties and Mr. Neals are available.

21 5. The next date following Mr. Neals's deposition that the Parties and Magistrate  
22 Judge James were available for a settlement conference is February 1, 2012. The Parties  
23 submitted a joint request that the Court reschedule the settlement conference to February 1, 2012.  
24 The Court granted this request on November 4, 2011.

25 6. A case management conference is currently on calendar for December 2, 2011.  
26 This conference initially was set to occur after the originally scheduled settlement conference if  
27 the Parties were unable to resolve the case on November 15, 2011. Now that the settlement  
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1 conference has been rescheduled for February 1, 2012, the Parties respectfully submit this joint  
2 request that the Court reschedule the case management conference to a date after February 1,  
3 2012.

4 7. Counsel for the Parties each believe that a case management conference will be  
5 most meaningful after the completion of the February 1, 2012 settlement conference with  
6 Magistrate Judge James. As a result, the request to reschedule the December 2, 2011 case  
7 management conference is being made jointly, for good cause, and by stipulation.

8  
9 SO STIPULATED:

10 Dated: November 15, 2011

LAW OFFICES OF WAUKEEN Q. McCOY, and  
RAJENDER LAW OFFICES

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13 By /s/ Waukeen Q. McCoy  
14 WAUKEEN Q. McCOY  
SHYAMALA T. RAJENDER  
15 Attorneys for Plaintiff  
16 REBECCA COOPER  
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18 Dated: November 15, 2011

VILLARREAL HUTNER & TODD PC

19  
20 By /s/ Lara Villarreal Hunter  
21 LARA VILLARREAL HUTNER  
22 JESSICA N. LEAL  
23 Attorneys for Defendant  
24 UNITED PARCEL SERVICE, INC.,  
an Ohio Corporation (erroneously named as "UNITED  
25 PARCEL SERVICE OF AMERICA, INC.")  
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1 IT IS SO ORDERED that:

2 1. The December 2, 2011 case management conference is taken off calendar.

3 2. The Parties' next case management conference will be rescheduled after the

4 February 1, 2012 settlement conference with Magistrate Judge James, on

5 \_\_\_\_\_ February 10, 2012 at 8:30 a.m.

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8 Dated: \_\_\_\_\_ November 18, 2011

By \_\_\_\_\_

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